

1 Michael J. Gearin, WSBA # 20982
2 Christopher M. Wyant, WSBA # 35561
3 K&L GATES LLP
4 925 Fourth Avenue, Suite 2900
5 Seattle, WA 98104-1158
6 (206) 623-7580

Honorable Timothy W. Dore
Chapter 11
Hearing Location: Seattle, Rm. 8106
Hearing Date: February 9, 2024
Hearing Time: 9:30 a.m.
Response Date: February 8, 2024

8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 In re:

11 STRATEGIES 360 INC.,

12 Debtor.

Case No. 23-12303-TWD

**ERIC SORENSON'S RESPONSE TO
MOTION TO AMEND FINAL
ORDER (1) AUTHORIZING USE OF
CASH COLLATERAL AND (2)
GRANTING ADEQUATE
PROTECTION**

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16 Eric Sorenson supports approval of Strategies 360, Inc.'s (the "Debtor") *Motion to Amend*
17 *Final Order (1) Authorizing Use of Cash Collateral and (2) Granting Adequate Protection* (the
18 "Motion"). Sorenson recognizes use of the Cash Collateral¹ is necessary to avoid disruptions to the
19 Debtor's business, and to preserve going concern value for the benefit of the estate and the creditors.

20 Over the past two weeks, the Debtor has modified its resistance to sharing important financial
21 information with Sorenson and there has been progress in dialogue with the Debtor regarding creditor
22 concerns. While the circumstances giving rise to the need to file this Motion reflect negatively on the
23 Debtor's current management, Sorenson continues to believe that the ongoing operation of the Debtor
24 is in the best interests of creditors and the estate.

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26 ¹ Unless otherwise indicated, capitalized terms have the meaning set out in the Final Order (1)
Authorizing Use of Cash Collateral, and (2) Granting Adequate Protection. Dkt. 146.

SORENSON'S RESPONSE TO MOTION TO AMEND
FINAL ORDER (1) AUTHORIZING USE OF CASH
COLLATERAL AND (2) GRANTING ADEQUATE
PROTECTION - 1

K&L GATES LLP
925 FOURTH AVENUE, SUITE 2900
SEATTLE, WASHINGTON 98104-1158
TELEPHONE: (206) 623-7580
FACSIMILE: (206) 623-7022

1 Under the terms of the cash collateral order, the Debtor provides KeyBank with certain reports.
2 Dkt. 146 (Order) Dkt. 175 (Motion) at 2; Dkt. 176 (Rosenberg Decl.) ¶ 4. Sorenson requests that going
3 forward, the Debtor be required to provide Sorenson and the Creditors Committee with the same
4 reporting it provides to KeyBank at the same time such reporting is provided to Key Bank.

5 Accordingly, Sorenson requests that the Court grant the Debtor's Motion and approve the
6 amendment to the cash collateral order.

7 DATED this 8th day of January, 2024.

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9 K&L GATES LLP

10 By /s/ Michael J. Gearin
11 Michael J. Gearin, WSBA # 20982
12 Christopher M. Wyant, WSBA # 35561
13 925 Fourth Avenue, Suite 2900
14 Seattle, WA 98104-1158
15 Telephone: (206) 623-7580
16 Email: michael.gearin@klgates.com
17 christopher.wyant@klgates.com

18 *Attorneys for Eric Sorenson*
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That she is a paralegal in the law firm of K&L Gates LLP, and on February 8, 2024, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

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